



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8

1595 Wynkoop Street
DENVER, CO 80202-1129
Phone 800-227-8917
<http://www.epa.gov/region08>

Ref: 8EPR-N

MAY 13 2010

Lynn D. Kolund, District Ranger
Hell Canyon Ranger District
Black Hills National Forest
330 Mt. Rushmore Road
Custer, SD 57730

RE: EPA Comments on Final Environmental
Impact Statement, Norbeck Wildlife Project,
CEQ #20100128

Dear Mr. Kolund:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA), 42 U.S.C. Section 4321, *et seq.*, and Section 309 of the Clean Air Act, 42 U.S.C. Section 7609, the U.S. Environmental Protection Agency Region 8 (EPA) has reviewed the March 2010 Final Environmental Impact Statement (FEIS) for the Norbeck Wildlife Project. This FEIS was prepared by the U.S. Department of Agriculture Forest Service (USFS) Black Hills National Forest to disclose and assess potential environmental impacts associated with the implementation of the Norbeck Wildlife Project in the Hell Canyon Ranger District, approximately 4 miles northeast of Custer, South Dakota. The USFS administers the 26,727 acres of the project area.

EPA provided scoping comments on the proposed project with an October 4, 2007 letter, and we provided additional comments on the Draft Environmental Impact Statement (DEIS) with a January 11, 2010 letter. As described in the DEIS, the proposed project would manage vegetation to benefit game animals and birds in the Norbeck Wildlife Preserve by selectively treating vegetation on approximately 6,000 – 7,500 acres within the Preserve, depending on the alternative. Up to about 7,500 acres would be treated with prescribed burning, depending on the alternative, with a maximum of 5,291 acres in the Black Elk Wilderness and 2,211 acres outside the Wilderness. EPA expressed concerns regarding the impacts to air quality and visibility from such a large burn area on nearby population centers and mandatory Class I and Sensitive Class II areas.

To address comments received on the DEIS, the FEIS includes supplemental information in Appendix I, Norbeck Wildlife Project Summary of Comments on the Draft EIS. The USFS has also issued a Record of Decision (ROD) for the project. Specifically, the USFS has decided to implement Alternative 4, with modifications, outside of the Black Elk Wilderness, and has

chosen to defer the decision on the proposed prescribed burning within the Black Elk Wilderness at this time.

Based on our review of the FEIS and the alternative selection as discussed in the ROD, EPA is satisfied that its primary concerns with the DEIS have been adequately addressed. Specifically, because the potential prescribed burn acreage has been significantly reduced from 7,502 acres (both within and outside the Black Elk Wilderness) to 2,208 acres (only outside the Wilderness), any related air quality and visibility impacts also will be significantly reduced. In addition, requirements would be implemented for: (1) appropriate smoke mitigation, modeling, and monitoring techniques; (2) the incorporation of the Interagency Prescribed Fire Planning and Implementation Procedures Guide into the Burn Plan designed specifically for this project; (3) coordination with the South Dakota Department of Environment and Natural Resources; and (4) adherence to the USFS internal process for managing prescribed fire. Therefore, EPA believes the FEIS supports the decision to implement Alternative 4, with modifications, outside the Black Elk Wilderness, and to defer decision on the proposed prescribed burning within the Wilderness at this time. However, please note that should you decide in the future to proceed with the originally-contemplated large prescribed burn, we would continue to recommend that you assess the smoke impacts to nearby population centers and Class I and Sensitive Class II areas.

We appreciate the opportunity to review this FEIS. If we may provide further explanation of our comments, please contact me at 303-312-6004, or your staff may contact Amy Platt at 303-312-6449.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Larry Svoboda', with a long horizontal flourish extending to the right.

Larry Svoboda
Director, NEPA Program
Ecosystems Protection and Remediation